

IN THE UNITED STATES DISTRICT COURT  
FOR SOUTH DAKOTA

---

RELIANCE TELEPHONE OF GRAND  
FORKS INCORPORATED,  
a North Dakota corporation,

and

RELIANCE SYSTEMS INC.,  
a Nevada corporation,

Plaintiffs,

v.

YANKTON COUNTY, SOUTH DAKOTA,

and

NETWORK COMMUNICATIONS  
INTERNATIONAL CORP.,  
a Texas corporation,

Defendants.

---

Civil No. 4:24-cv-04098-ECS

**JOINT STIPULATED MOTION  
TO SUBMIT DOCUMENTS  
FOR *IN CAMERA* REVIEW BY  
THE COURT**

The parties, by their respective undersigned counsel of record, hereby jointly move the Court for permission for Defendant Network Communications International Corp. and Defendant Yankton County, South Dakota to submit the documents that are the subject of Plaintiffs' Motion to Compel Production of Documents from Defendant Network Communications International Corp. (DOC 69) and Plaintiffs' Motion to Compel Production of Documents from Defendant Yankton County, South Dakota (DOC 70) directly to the Court for *in camera* review.

Dated: April 22, 2025.



Alan M. Anderson (MN Bar #149500)

(admitted *pro hac vice*)

L. Reagan Florence (MN Bar #0396468)

(admitted *pro hac vice*)

ALAN ANDERSON LAW FIRM LLC

11100 Wayzata Blvd., Suite 545

Minneapolis, MN 55305

Tel: 612-756-7010

Fax: 612-756-7050

Email: [aanderson@anderson-lawfirm.com](mailto:aanderson@anderson-lawfirm.com)

[rflorence@anderson-lawfirm.com](mailto:rflorence@anderson-lawfirm.com)

and

Patrick L. Sealey

HEIDMAN LAW FIRM, P.L.L.C.

1128 Historic Fourth Street

P.O. Box 3086

Sioux City, IA 51102

Tel: 712-255-4121

Fax: 712-258-6714

Email: [patrick.sealey@heidmanlaw.com](mailto:patrick.sealey@heidmanlaw.com)

*Attorneys for Plaintiffs Reliance Telephone  
of Grand Forks Incorporated and Reliance  
Systems Inc.*

Dated: April \_\_, 2025.

Nicholas G. Moser – SDBA #4650

Dylan M. Miller – SDBA #5439

Marlow, Woodward & Huff, Prof. LLC

PO Box 667

200 W. Third St.

Yankton, SD 57078

Telephone: (605) 665-5009

Facsimile: (605) 665-4788

Email: [nick@mwhlawyers.com](mailto:nick@mwhlawyers.com);

[dylan@mwhlawyers.com](mailto:dylan@mwhlawyers.com)

*Attorneys for Defendant Network  
Communications International Corp.*

Dated: April \_\_, 2025.

---


Alan M. Anderson (MN Bar #149500)  
(admitted *pro hac vice*)  
L. Reagan Florence (MN Bar #0396468)  
(admitted *pro hac vice*)  
ALAN ANDERSON LAW FIRM LLC  
11100 Wayzata Blvd., Suite 545  
Minneapolis, MN 55305  
Tel: 612-756-7010  
Fax: 612-756-7050  
Email: aanderson@anderson-lawfirm.com  
rflorence@anderson-lawfirm.com

and

Patrick L. Sealey  
HEIDMAN LAW FIRM, P.L.L.C.  
1128 Historic Fourth Street  
P.O. Box 3086  
Sioux City, IA 51102  
Tel: 712-255-4121  
Fax: 712-258-6714  
Email: patrick.sealey@heidmanlaw.com

*Attorneys for Plaintiffs Reliance Telephone  
of Grand Forks Incorporated and Reliance  
Systems Inc.*

Dated: April 21<sup>st</sup>, 2025.

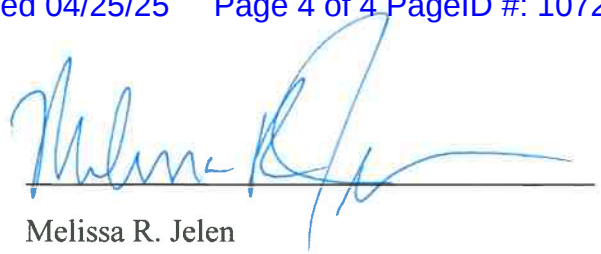


---

Nicholas G. Moser – SDBA #4650  
Dylan M. Miller – SDBA #5439  
Marlow, Woodward & Huff, Prof. LLC  
PO Box 667  
200 W. Third St.  
Yankton, SD 57078  
Telephone: (605) 665-5009  
Facsimile: (605) 665-4788  
Email: nick@mwhlawyers.com;  
dylan@mwhlawyers.com

*Attorneys for Defendant Network  
Communications International Corp.*

Dated: April 23, 2025.



Melissa R. Jelen

Claire E. Wilka

Cadwell Sanford Deibert & Garry LLP

200 E 10th Street Suite 200

Sioux Falls, SD 57104

Ph: (605)336-0828

Email: [mjelen@cadlaw.com](mailto:mjelen@cadlaw.com)

[cwilka@cadlaw.com](mailto:cwilka@cadlaw.com)

*Attorneys for Defendant Yankton County,  
South Dakota*